

MARK E. FERRARIO  
Nevada Bar No. 1625  
JASON K. HICKS  
Nevada Bar No. 13149  
**GREENBERG TRAURIG, LLP**  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, Nevada 89135  
Telephone: (702) 792-3773  
Fax: (702) 792-9002  
Email: ferrariom@gtlaw.com  
hicksja@gtlaw.com

*Attorneys for Dana Dorado*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SANDRA M. MEZA-PEREZ, an individual,  
  
Plaintiff,

v.

SBARRO LLC dba SBARRO PIZZA, a  
foreign limited liability company; SBARRO,  
INC. dba SBARRO PIZZA, a foreign  
corporation; ZACHARY CEBALLES, an  
individual; EFRAIN HERNANDEZ, an  
individual; JESUS ALATORRE, an  
individual; DANA DORADO, an individual,  
  
Defendants.

Case No.: 2:19-cv-373-APG-NJK

**STIPULATION AND ~~PROPOSED~~  
ORDER EXTENDING TIME FOR DANA  
DORADO TO SUBMIT HER REPLY IN  
SUPPORT OF HER MOTION FOR  
ATTORNEY'S FEES AND COSTS  
PURSUANT TO THE COURT'S ORDER  
GRANTING RULE 11 SANCTIONS  
AGAINST PLAINTIFF'S COUNSEL [ECF  
180]**

**(First Request)**

IT IS HEREBY STIPULATED AND REQUESTED by and between Plaintiff's counsel  
Melanie Hill and Hardeep Sull on the one hand and Dana Dorado on the other, through their  
respective counsel and pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, that the Court extend  
the deadline for Ms. Dorado to submit her Reply in support of her Motion for Attorney's Fees and  
Costs Pursuant to the Court's Order Granting Rule 11 Sanctions (the "Motion"), up to, and  
including, **January 20, 2021**. This stipulation is made and based upon the following:

1. On September 30, 2020, the Court entered an order granting Ms. Dorado's Motion  
for Sanctions under Rule 11. ECF No. 177.

2. That order directed Ms. Hill, Ms. Sull, and Ms. Dorado to confer about the amount of fees and costs to be awarded pursuant to that order and, if they could not agree, to brief the matter for the Court.

3. The parties were unable to agree on the amount of costs and fees to be awarded therefore Ms. Dorado submitted the Motion on November 30, 2020.

4. By stipulation, Ms. Hill and Ms. Sull submitted their opposition to the Motion on January 4, 2021.

5. Ms. Dorado's reply is currently due on January 11, 2021.

6. Ms. Hill, Ms. Sull, and Ms. Dorado agree and request that Ms. Dorado have up to, and including, **January 20, 2021**, to file her reply in support of the Motion. This request is made in order to accommodate competing obligations held by Ms. Dorado's counsel and agreed to by Ms. Hill's and Ms. Sull's counsel as a professional courtesy.

7. This is the first request for the relief sought herein, made in good faith and not for purposes of delay.

Dated this 8<sup>th</sup> day of January 2021.

Dated this 8<sup>th</sup> day of January 2021.

/s/ Joseph Garin  
JOSEPH P. GARIN, ESQ.  
Nevada Bar No. 6653  
**LIPSON NEILSON P.C.**  
990 Covington Cross Dr., Suite 120  
Las Vegas, NV 89144

*Counsel for Melanie Hill and Hardeep Sull*

/s/ Jason K. Hicks  
MARK E. FERRARIO, ESQ.  
Nevada Bar No. 1625  
JASON K. HICKS, ESQ.  
Nevada Bar No. 13149  
**GREENBERG TRAUIG, LLP**  
10845 Griffith Peak Drive, Suite 600  
Las Vegas, NV 89135

*Counsel for Dana Dorado*

**IT IS SO ORDERED.**

  
UNITED STATES DISTRICT JUDGE

Dated this 8th day of January 2021.